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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**RACHAEL NAVARRO**, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

**JUSTFAB, LLC d/b/a JUSTFAB**, a  
Delaware limited liability company,

Defendant.

Case No. 2:21-cv-01002-JAM-DMC

**UNOPPOSED SECOND  
MOTION FOR EXTENSION OF  
TIME FOR JOINT STATUS  
REPORT AND RELATED  
DEADLINES**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Rachael Navarro (“Navarro” or “Plaintiff”), by and through her counsel, hereby files this Unopposed Second Motion for Extension of Time for Joint Status Report and Related Deadlines. Plaintiff respectfully moves the Court for a thirty-one (31) day extension to **December 27, 2021** for the Parties to file a Joint Status Report, as well as any

1 related deadlines under Rule 16, Rule 26, and Local Rule 240. In support of the  
2 motion, Plaintiff states as follows:

3 1. On June 4, 2021, Plaintiff filed a putative class action complaint  
4 (“Complaint”) against Defendant JustFab, LLC d/b/a JustFab (“JustFab” or  
5 “Plaintiff”). (Dkt. 1.) On June 9, 2021, JustFab was served with the Complaint and  
6 Summons (dkt. 7).

7 2. Defendant has retained counsel in this matter, and counsel for the  
8 Parties have been in contact regarding the facts of the case. In light of these  
9 discussions, Plaintiff previously requested extensions to Defendant’s deadline to  
10 respond to the complaint.

11 3. The Parties have worked cooperatively to share information that may  
12 result in early resolution of this matter after further factfinding. Such factfinding is  
13 in progress, and Plaintiff is currently waiting to receive relevant records from a  
14 third-party carrier regarding the text messages alleged in this case.

15 4. Plaintiff was previously informed by the carrier that records would be  
16 provided prior to November 26, 2021—the current deadline to file a Joint Status  
17 Report—but due to a personnel change, production of the requested records has  
18 been delayed. Plaintiff expects to receive the records prior to December 27, 2021,  
19 and such records will play a critical role in determining how the Parties may  
20 proceed in this matter.

21 4. Plaintiff hereby requests an additional thirty-one (31) days for the  
22 parties to continue this factfinding and evaluate records prior to filing a Joint Status  
23 Report. Counsel for Plaintiff is in contact with the aforementioned third party  
24 regarding the records necessary to evaluate Plaintiff’s claims, and the additional  
25 time will permit counsel for Plaintiff to receive and assess such records and  
26 determine whether an early resolution of this matter may be achieved.



**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2021, a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's CM/ECF system.

/s/ Stephen A. Klein